

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAURA M. PORTELA,
Plaintiff

vs.

WAL-MART STORES EAST, LP,
Defendant

)
)
)
)
)
)
)

C.A. NO. 05-10844 MEL

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The parties, by and through counsel, state that they have conferred in this matter and hereby submit their Joint Statement Pursuant to Local Rule 16.1(D).

A. Proposed Pre-Trial Schedule

1. Amendments to pleadings to add parties by: November 1, 2005
2. Completion of written discovery and fact depositions by: January 30, 2006
3. Plaintiff's designation of expert witnesses by: March 15, 2006
4. Defendant's designation of expert witnesses by: May 2, 2006
5. Expert depositions by: August 1, 2006
6. Dispositive Motions by: September 15, 2006
7. Final Pre-Trial Conference by: October 14, 2006

B. The parties have not yet determined whether they will consent to trial by magistrate judge.


C. The plaintiff has presented a written settlement proposal to the defendant.

D. The parties' certifications pursuant to Local Rule 16.1(D)(3) will be submitted.

Respectfully submitted,

The plaintiff,
By her Attorneys,

KECHES & MALLEN, P.C.


CHARLOTTE E. GLINKA

BBO # 559117

122 Dean Street

Taunton, MA 02780

(508) 822-2000

The defendant,
By its Attorneys,

CRAIG AND MACAULEY, P.C.


ANNA L. JOHNSON

BBO # 657123

Federal Reserve Plaza

600 Atlantic Avenue

Boston, MA 02210

(617) 367-9500

DATED: August 25, 2005

JtStmt-16.1D3

CERTIFICATE OF SERVICE

I, Charlotte E. Glinka, of Keches & Mallen, P.C., counsel for the plaintiff, hereby certify that on this 25th day of August, 2005, I served the parties' **Joint Statement Pursuant to Local Rule 16.1(D)**, by forwarding a copy of same by first-class mail, postage prepaid, to:

Richard E. Quinby, Esquire
Anna L. Johnson, Esquire
CRAIG AND MACAULEY, P.C.
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210


CHARLOTTE E. GLINKA

CertSvc2

KECHES & MALLIN, P.C.

ATTORNEYS AT LAW

122 Dean Street
Taunton, MA 02780
(508) 822-2000
Fax (508) 822-8022
www.keches-mallen.com

George N. Keches
Richard T. Mallin
Joseph F. Agnelli, Jr.
Brian C. Cloherty
Brian C. Dever
Judith B. Gray**
Charlotte E. Glinka

Kathy Jo Cook
Claudine A. Cloutier*
Seth J. Elin
Matthew F. King
Ernest J. Palazzolo, Jr.
Mark D. Warcup
Daniel M. Surprenant

Of Counsel

Ann Marie Maguire

Gregg J. Pasquale
Melissa A. White

*Admitted in Massachusetts and Rhode Island

**Admitted in Massachusetts, Rhode Island and Connecticut

August 25, 2005

email: cglinka@keches-mallen.com

VIA FEDERAL EXPRESS

Civil Clerk's Office
UNITED STATES DISTRICT COURT
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210

*RE: Laura Portela vs. Wal-Mart Stores East, LP
United States District Court, C.A. No. 05-10844 MEL*

Dear Madam or Sir:

Enclosed with reference to the above matter and the Scheduling Conference on September 1, 2005, please find the following for docketing and filing:

1. Joint Statement Pursuant to Local Rule 16.1(D); and
2. Certificate of Service.

Thank you for your attention to the foregoing.

Very truly yours,

KECHES & MALLIN, P.C.


Charlotte E. Glinka

CEG/dkd
Enclosures
FedCrt3-JtStmt

cc: Anna L. Johnson, Esquire